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13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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16 JOHN DOE, an individual

17 Plaintiff,

18 v.
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20 CHEVRON CORPORATION, and
21 CHEVRON GLOBAL TECHNOLOGY
22 SERVICES CO.

23 Defendants.
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Case No. 3:25-cv-04534

**DECLARATION OF ERICA POSEY IN
SUPPORT OF (1) PLAINTIFF'S REPLY
ISO ADMINISTRATIVE MOTION TO
PROCEED UNDER A PSEUDONYM
AND (2) PLAINTIFF'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE REPLY**

Concurrently Filed/Lodged With:

1. Administrative Motion for Leave to File Reply in Support of Plaintiff's Motion to Proceed Under a Pseudonym
2. [PROPOSED] Reply ISO Administrative Motion to Proceed Under a Pseudonym
3. [PROPOSED] Order Granting Leave to File Reply Brief

DECLARATION OF ERICA POSEY

I, Erica Posey, declare under the penalty of perjury that the following is true and correct. I am over the age of 18. The facts stated in this declaration are true of my own personal knowledge, except as to any matters stated on information and belief, and as to those matters, I am informed and believe them to be true. If called as a witness, I would and could competently testify to the matters set forth below.

1. On Tuesday, May 27, 2025, Bryan Schwartz, counsel for Plaintiff, reached out to Catherine Conway via email to inquire whether she would accept service of the complaint in the above-named matter, as the attorney who has represented Defendants throughout prelitigation proceedings on this matter. Ms. Conway responded and indicated that while she would likely be able to accept service in the matter, she would need to check in with her clients first.

2. On Wednesday, May 28, 2025, Ms. Conway requested that we share some pages of the initial complaint, so as to advise her clients of their contents prior to agreeing to accept service.

3. On Thursday, May 29, 2025, in the morning, I sent the caption pages for both the complaint and administrative motion to proceed under a pseudonym to Ms. Conway via email so that she could advise her clients of the contents prior to agreeing to accept service.

4. In the afternoon of Thursday, May 29, 2025, after filing the complaint and having still not heard back from Ms. Conway with respect to her authority to accept service, our office proceeded with filing the administrative motion to proceed under a pseudonym. We shared file-stamped copies of the motion and complaint with Ms. Conway via email after filing, with the understanding that we would not formally serve the documents until Ms. Conway confirmed her authority to accept service of the pleading in this matter.

5. On Friday, May 30, 2025, Ms. Conway confirmed that she would accept service of the pleading as of Monday, June 2, 2025.

6. On Monday, June 2, 2025, after our paralegal served the papers via email on Ms. Conway, Mr. Schwartz reached out to Ms. Conway via email to inquire about Defendant's position on the Administrative Motion to Proceed Under Pseudonym. At this time, Ms. Conway indicated that Defendants intended to oppose the motion. That evening, Defendants filed their opposition.

